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*Attorneys for Plaintiffs; additional counsel
listed in signature blocks below*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL CATALDO,
EMIR GOENAGA, JULIAN SANTIAGO,
HAROLD NYANJOM, KELLIE NYANJOM,
and SUSAN LYNN HARVEY, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC

Defendants.

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Attorneys for Defendant Google LLC

Case No. 3:20-cv-04688-RS

**JOINT STIPULATION AND
ORDER TO CONTINUE DISCOVERY
DEADLINES**

Judge: Hon. Richard Seeborg

Pursuant to Civil L.R. 6-2 and 7-12, this joint stipulation is entered into by and between Plaintiffs Anibal Rodriguez, et al and Defendant Google LLC (collectively, the “Parties”).

WHEREAS, the parties have been working to complete discovery in this case pursuant to the Court’s deadlines, and

WHEREAS, the pleadings have not yet been settled, and

WHEREAS, the case schedule allows for some flexibility in the fact discovery and expert disclosure deadlines without moving any other deadlines in the case, and

WHEREAS, the scope of discovery may change depending on the Court’s ruling on Google’s pending motion to dismiss (Dkt. 115), and

WHEREAS, the parties agree to negotiate in good faith whether and to what extent a second extension may be needed after the Court has issued an order on the pending motion to dismiss, and

WHEREAS, there have been no other extensions of the case schedule set by the Court;

NOW THEREFORE, the parties agree to the following:

- The parties agree to extend the fact discovery deadline (Dkt. 59) by 60 days to January 11, 2022.
- The parties agree to extend the expert disclosure date, which is currently set on December 13, 2021 (Dkt. 59), to January 11, 2022, to match the new discovery deadline.
- After the Court has issued an order on the pending motion to dismiss, the parties agree to meet and confer regarding other deadlines as needed.

DATED: August 13, 2021

By: /s/ James W. Lee

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Attorneys for Plaintiffs

1
2 DATED: August 13, 2021

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10 **SAN FRANCISCO DIVISION**
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and SUSAN LYNN HARVEY, individually
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16 Plaintiffs,

17 v.

18 GOOGLE LLC

19 Defendants
20

Case No. 3:20-cv-04688-RS
ORDER

21 Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the discovery
22 deadline and expert disclosure deadline are extended until January 11, 2022.
23

24 **IT IS SO ORDERED.**

25
26 Dated: August 13, 2021

27 
28 The Honorable Richard Seeborg